

4241 State Office Building • Salt Lake City, UT 84114 • 801-533-5771

August 28, 1984

Mr. E. S. Gallacher, President Portland Cement Company of Utah P. O. Box 1469 Salt Lake City, Utah 84110

Dear Mr. Gallacher:

RE: Mining and Reclamation Plan Review, Portland Cement Company of Utah, Little Mountain Mine, ACT/045/005, Tooele County, Utah

The Division has completed its review of the Mining and Reclamation Plan (MRP) for the Little Mountain Mine. The Division's technical staff has formulated the following comments:

Rule M-3(2)(c)

The approximate number of acres of disturbance that will have topsoil redistributed during final reclamation must be submitted.

Rule M-3(2)(d)

The manner and extent of regrading should be indicated on Map 2. The plan states that "regrading will be done to restore natural grade where possible." The question that arises is what is meant by "where possible?" Please indicate.

Rule M-3(2)(e)

A complete revegetation plan must be submitted. It should include seed mix(es) and rate of seeding in pure live seed (PLS) per acre, stocking rates (stems/acre) for shrub plantings, a discussion of the methods for seedbed preparation, seeding and planting, mulching and fertilization techniques and rates and the season of planting. All planting mixtures should be consistent with the postmining land-use.

Page Two Mr. E. S. Gallacher ACT/045/005 August 28, 1984

A map showing the location of all areas to be revegetated and a list of their acreages must be provided.

Protection of reclaimed areas from livestock grazing should be discussed.

Rule M-3(2)(f)

The timetable for the accomplishment of each major step in the reclamation plan should be given at this time, not at mine closure. Please submit this information.

Rule M-3(1)(a)

Map 1 indicates the permit area of about 320 acres and the plan indicates a disturbance of 22 acres (including roads). Please clarify.

Rule M-3(1)(b)

Map 1 was referenced in the Mining and Reclamation Plan (MRP), but was not submitted. If Map #1 is applicable, then it must be submitted.

Map #2 is not clear and many portions are difficult to read. A clear, precise map(s) must be submitted that includes all information required on Form MR-1(13).

A map delineating the yearly sequential disturbance, MR-1(15)1, must be submitted.

Rule M-3(1)(g)

The location of stockpiles (e.g., shale and limestone) must be located on the map. Will they present a stability problem? If not, why?

Rule M-5 Surety Guarantee

A detailed cost estimate must be submitted to the Division. This estimate should include unitized figures (number of cy at \$/cy, for example). The source of the costs should also be given, i.e., Rental Rate Bluebook, Means, Dogde, etc. Please submit a detailed costs analysis of the reclamation costs.

Page Three Mr. E. S. Gallacher ACT/045/005 August 28, 1984

Rule M-10(2)(b)

How will the trash, scrap metal, waste oil/solvents be collected? Will it be a dumpster, bermed area or what? Please elaborate.

Rule M=10(2)(c)

How will drill holes be plugged? It is stated in the plan that they will be "properly" plugged. Please explain.

Rule M=10(3)(11)(13) Reclamation Standards

The applicant has not adequately addressed the requirements of Parts 3, 11 and 13 of Rule M-10. The Division was under the assumption that the applicant was going to provide sediment control in the form of a catch basin, preferably on the inside of the road, i.e., a catch basin with rock wire gabion outlet would be considered acceptable. This catch basin or other alternative sediment control methods should provide sediment control for the stockpile, work area and access road adjacent to the stockpile.

After talking with Brian Nielson, Department of Health, State of Utah, on August 20, 1984, he expressed this would be acceptable to their Department.

Rule M-10(4)

The postmining highwalls will be at a 450 slope angle. A safety measure of periodic checking would be advisable. Please submit a schedule for this check.

The application must include information about the angle of repose for the overburden stockpile.

Rule M-10(5)

Clearly illustrate reclamation statements by including cross-sectional diagrams that show the final configuration of highwall and pit areas.

Rule M-10(6)

The applicant repeatedly indicates that no toxic materials will be encountered. Chemical and physical analyses of the overburden supporting these claims must be submitted. Page Four Mr. E. S. Gallacher ACT/045/005 August 28, 1984

Rule M-10(7)

It is stated that the main access road will not be reclaimed? Is this the wish of the landowner? If so, please document.

Rule M-10(12)

It is unclear from the statement on the MR-l Form, No. 20, exactly how the surrounding vegetation cover was estimated. Baseline vegetation studies to determine the representative ground cover of all areas to be disturbed during mining operations must be conducted in order to set a standard for revegetation success. The methods for obtaining these cover values must be described in detail and approved by the Division.

Monitoring of revegetated areas during the bond release period should be discussed. Include a description of the monitoring methods and how they will be used to determine whether the revegetation success standards have been met.

Rule M-10(14)

Information from the soil sample sites, such as depth of soil encountered, texture and quality of soil, must be submitted.

If you have any questions concerning this review, contact the Division at your earliest convenience.

Sincerely,

Mary M. Boucek

Permit Supervisor/ Reclamation Biologist

EH/btb

cc: Jim Smith Steve Cox

Pam Grubaugh-Littig

Ev Hooper Tom Munson Rick Smith John Whitehead

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